From the desk of Louis Gabriele, Treasurer, NABET-CWA Local 53 1918 W. Burbank Boulevard Burbank, California 91506-1317

RE: FCC: Regarding Media Ownership Rules

February 14, 2003

I am Louis Gabriele. I belong to the Broadcast and Cable Union, the Treasurer of NABET-CWA Local 53. We are part of the Communication Workers of America, an organization that boasts a membership over 700,000 representing broadcast, cable, radio, and telephone, newspaper and print professionals. I also belong to the Television Academy. The Academy of Television Arts and Sciences have 11,000 members.

The current rules, regarding Media ownership, limit a single corporation from dominating a local TV market; from merging a community's TV stations and newspapers into one voice; from merging two major TV networks; and from controlling more than 35 percent of TV households in the nation. Changes to the existing FCC ownership rules will impact all of our members. We depend upon diverse and enriching sources of information and entertainment from the media. It is imperative that the Commission adopt structural rules to promote diversity, competition and localism.

Unions around the country in news and entertainment are responding to the call for structured rules. The CWA has filed formal comments in support of structural rules to ensure media diversity, competition, and localism. Copies of the FCC filing and supporting reports are available on the web site at saveourmedia.org. Others before me including Jim Joyce, Vice President of NABET-CWA, have voiced their opinions and experiences regarding duopolies in New York and Los Angeles. Fox owns nine duopolies. NBC has bought Telemundo which owns KVEA-TV and KWHY-TV in Los Angeles. They both share the same management and what's different about KWHY; it has a separate executive producer. Both stations will be moving and integrating with KNBC sharing various facilities.

What does common ownership mean for the NBC duopoly in Los Angeles? NBC claims KVEA, KWHY and KNBC will operate separately. Between new technology and integration, there will be staff reductions. For example, units like maintenance will be merged and operate as one unit. There will be some comingling of the video editors and crews which will include sharing of news tape footage. NABET-CWA anticipates the co-mingling will accelerate when KVEA and KWHY move to Burbank where KNBC is located.

What if the FCC votes to remove or significantly modifies the present rules? One company could dominate a region's access to information by controlling its radio stations, television stations, newspaper and cable system. General Electric, which owns NBC, could be a super media giant by buying up and merging with Westinghouse and Disney. Then move into radio by buying Clear Channel, which owns more than 1,200 radio stations around the country. If that isn't enough, merge with the Hearst Corporation.

Is that far-fetched? Yes, or is it? Could it be fixed?

Does democracy hang in the balance?